



County of Los Angeles CHIEF ADMINISTRATIVE OFFICE

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Chief Administrative Officer

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August 19, 2003

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

**PRELIMINARY COMMENTS ON DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT
STATEMENT/SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR PROPOSED
MASTER PLAN IMPROVEMENTS AT LAX
(ALL DISTRICTS AFFECTED) (3 VOTES)**

IT IS RECOMMENDED THAT YOUR BOARD:

1. Approve preliminary comments on the Draft Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR) prepared for the Safety and Security Alternative for the Proposed Master Plan Improvements at Los Angeles International Airport (LAX); and authorize County staff and A.C. Lazzaretto & Associates to present preliminary comments at Los Angeles World Airports (LAWA) and Federal Aviation Administration (FAA) sponsored public hearings.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The purpose of this recommended action is to accept the attached preliminary comments from A.C. Lazzaretto & Associates (Attachment I) and the Department of Public Works (Attachment II) as the County's initial response to the Draft SEIS/SEIR and present them at public hearings scheduled for August 20 through 23, 2003 (Attachment III is a list of currently scheduled hearings). Submission of the County's preliminary comments allows for concerns and suggestions detailed in the preliminary comments to be addressed by LAWA and the FAA.

Implementation of Strategic Plan Goals

These recommendations are consistent with the following Strategic Plan Goal:

Goal: **Organizational Effectiveness:** Ensure that service delivery systems are efficient, effective, and goal-oriented.

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The County is seeking to ensure that any air service expansion plan is environmentally, economically, and socially beneficial to the residents of Los Angeles County.

FISCAL IMPACT/FINANCING

Not applicable.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

On July 10, 2001, your Board approved the final report on the Draft EIS/EIR for the Proposed Master Plan Improvements at LAX submitted by A.C. Lazzaretto & Associates as the County's official comments on the Draft EIS/EIR. Due to the events of September 11, 2001, newly elected Los Angeles Mayor James Hahn directed LAWA to develop a new alternative focused on safety and security. On January 21, 2003, your Board instructed this office to negotiate a delegated authority contract with A.C. Lazzaretto & Associates to conduct a review and analysis of the anticipated Draft SEIS/SEIR for the new alternative.

On July 9, 2003, the Draft SEIS/SEIR for the Safety and Security Alternative to the Proposed Master Plan Improvements (Alternative D) was released and a public review and comment period commenced. The Airport Commission recently extended the review and comment period from 45 days to 120 days.

On July 15, 2003, this office entered into agreement with A.C. Lazzaretto & Associates to conduct the requested review. The consultant has assembled a team of environmental and security experts to review the documents for consistency and accuracy, with special attention to the major areas of noise, traffic, security, air and water, and environmental justice. Consistent with their contract, the consultant is presenting preliminary comments to your Board on the Draft SEIS/SEIR. The Department of Public Works is also submitting preliminary comments on traffic impacts which have been coordinated with A.C. Lazzaretto & Associates. Final comments will be presented for Board approval within a time frame to allow for presentation at additional hearings anticipated to being set prior to the comment period deadline on November 7, 2003.

The following is a summary of preliminary comments from A.C. Lazzaretto & Associates and the Department of Public Works regarding the Draft SEIS/SEIR:

- The proposed Master Plan Alternative D may not constrain growth at LAX.
- Airport security may not be fully achieved by Alternative D.
- Environmental Justice may not be well served by Alternative D.
- The Baseline Year of 1996 is not adequate for a 2003 assessment.

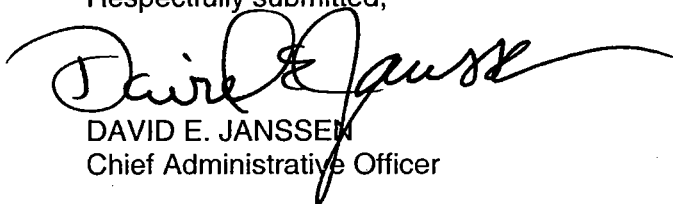
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- The No Project Alternative does not offer a consistent yardstick for measuring project impacts.
- Traffic, noise, and air quality impacts have been shifted eastward.
- Major changes in the project may call for preparation of a subsequent EIR.
- Growth-inducing impacts may be significantly greater than stated.
- A new interchange for the I-405 Freeway at Lennox Blvd is recommended if Alternative D is chosen.
- Document is lacking in mitigation measures due to inadequate analysis/information of traffic/transportation projects, enhancements, and improvements.

IMPACT ON CURRENT SERVICES

This action will not have a direct impact on County services.

Respectfully submitted,



DAVID E. JANSSEN
Chief Administrative Officer

DEJ:LS
MKZ:JR:nl

Attachments (3)

c: County Counsel
Director of Planning
Director of Public Works
Director and Chief Medical Officer of Health Services
The Honorable James K. Hahn, Mayor of the City of Los Angeles
Jim Ritchie of the Los Angeles World Airports
David B. Kessler, AICP of the Federal Aviation Administration

**A Preliminary Review of Issues Associated with the
LAX Master Plan Supplemental Draft EIS/EIR**

*Prepared for the Los Angeles County Board of Supervisors
by A.C. Lazzaretto and Associates
11 August 2003*

INTRODUCTION

The Federal Aviation Administration (FAA) and Los Angeles World Airports (LAWA) made available for public comment in early 2001 a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) addressing three build alternatives, a no-build alternative, and the existing setting for the Los Angeles International Airport (LAX) Master Plan. In response to considerable public comment and the terrorist attacks that occurred on September 11, 2001, a fourth alternative -- Alternative D, the Enhanced Safety and Security Plan -- has been added to the LAX Master Plan. A Supplemental EIS/EIR was made available for public comment in July of 2003 to update information presented in the Draft EIS/EIR and to integrate Alternative D into the environmental review process.

Alternative D includes a number of airfield facility modifications. Although LAX would continue to operate with 4 runways, 2 of the existing runways would be moved, two would be lengthened, and all would be further separated from one another. The existing parking structures would be relocated and replaced by new centralized passenger terminals. The existing Terminals 1 through 7 would be reconfigured, including a new north/south linear concourse at the Tom Bradley International Terminal, flanked on the west by a new satellite concourse. A new ground transportation center and intermodal transportation center to be built east of Aviation Blvd. would serve as the primary access for all passenger drop-off and pick-up and vehicle parking. Some cargo facilities would be modified, although overall square footage would be equivalent to the No Action/No Project Alternative.

A brief preliminary review of the Supplemental EIS/EIR for the LAX Master Plan has been conducted to assess changes between the Draft and Supplemental EIS/EIR, consistency of information within the documents, and accuracy of the Supplemental EIS/EIR. The initial review points to several issues requiring further comment and discussion.

One of these issues was central to County comments on the earlier LAX Master Plan review, and remains an area of potential concern for the current document: although LAWA indicates that its goal is to limit growth, improvements proposed as part of Alternative D would in reality serve to reinforce LAX as the preeminent airport of the southern California region, and may undermine attempts to strengthen the role of outlying airports. In addition to this thematic concern, there are a number of additional points that merit further consideration. The preliminary findings are outlined briefly in the discussion below.

DISCUSSION

1. The Proposed Master Plan Alternative D May Not Constrain Growth at LAX

The stated goal of Alternative D is to limit growth at LAX to 78 Million Annual Passengers (MAP) and induce growth at other regional airports. The primary means to accomplish this is to limit aircraft gates to 153 which is the same number of gates that exist in the No Project Alternative (NPA). However, the NPA includes 48 remote gates

that are simply aircraft parking spaces on concrete. Alternative D provides 153 fully functional and high capacity gates and does not remove the concrete which will remain available for aircraft parking. The true number of gates is therefore over 200. Furthermore, the design of the new gates is a linear configuration as opposed to the existing cul-de-sac configuration. The linear configuration is more flexible and has more capacity. Also, space in the western portion of the airport will remain available for future consideration of a new west terminal, as proposed in Alternatives A, B and C. Therefore, the gate limitation is not an effective constraint on passenger levels.

Alternative D includes other improvements that would support growth beyond the 78 MAP level. In particular, the new remote terminal in the Manchester Square area provides 6.5 million square feet of terminal space -- more than 50% greater than the 4 million square feet proposed in the 98 MAP Alternatives A, B and C. Further, many of the proposed improvements to the north airfield are designed to accommodate the new generation of larger aircraft.

Orientation of new LAX facilities to the new larger aircraft could have long-term, pervasive effects. Because the new larger aircraft require many smaller connecting flights to fill its 600 seats, these improvements will strengthen the "confluence of connections" that reinforce LAX as the preeminent airport of the southern California region, and at the same time reduce the incentive for airlines to utilize other regional facilities. A true constraint on the growth of LAX would be to make it inhospitable towards the new larger aircraft, coupled with improvements to serve new larger aircraft at another regional airport, and transit links to join the two facilities.

2. Airport Security May Not be Fully Achieved by Alternative D

Preliminary review suggests that the Supplemental EIS/EIR may fall short of an adequate review of airport security issues. Although the Executive Summary to the Addendum refers the reader to Appendix I *'for a detailed assessment of the security and safety features of Alternative D,'* Appendix I offers a heavily conceptual and theoretical document that falls significantly short on detail. Anomalies include contradictory content and a lack of clarity expected of a public information document.

3. Environmental Justice May Not be Well Served by Alternative D

Presidential Executive Order 12898, issued in February 1994, requires all federal agencies to analyze environmental justice impacts when proposing public projects. The analysis is intended to determine whether minority and low-income communities are unfairly burdened by project impacts, with the goal of using mitigation measures to create a level playing field. In 1999, Senate Bill 115 was passed making environmental justice a requirement of CEQA as well.

Despite the importance of this subject, the original Draft EIS/EIR was found to lack even the most elementary NEPA requirements for environmental justice. Preliminary review suggests that the Supplemental EIS/EIR has corrected some but not all of the earlier deficiencies. In particular, the Supplemental EIS/EIR again limits the area of analysis (reviewing only those census tracts surrounding LAX), improperly omits assessment of many effects due to the preparers' inability to quantify or analyze the impacts, and defers a determination of significance pending completion of the mitigation program.

The assessment does not appear to consider the trade-offs between environmental protection and environmental justice pertaining to the placement and length of LAX runways: runway extension to the west would have significant adverse impacts on biological resources (particularly the El Segundo Blue Butterfly), but would serve environmental justice through a significant lessening of noise, air quality and traffic impacts on Lennox, Inglewood and other disadvantaged communities around LAX. Nor does the assessment apply rigorous standards in assessing the proportionality of impacts and mitigation measures between the wealthier northside area and communities east of LAX including Lennox and Inglewood. These relevant issues require further review as part of the Supplemental EIS/EIR.

4. The Baseline Year of 1996 is Not Adequate for a 2003 Impact Assessment

It appears that the Supplemental Draft EIS/EIR continues to use 1996 data to establish baseline conditions for a number of topical issues. This outdated reference point was considered inadequate for the original EIS/EIR, and remains unsuitable for use in the current Supplemental EIS/EIR.

5. The No Project Alternative Does Not Offer a Consistent Yardstick for Measuring Project Impacts

The original EIS/EIR provided an incomplete discussion of the No Project Alternative by incorporating improvements that were then only in the "planning stages" and overstating the service levels and capacity of the existing facilities. This approach made it difficult to draw meaningful comparisons with project alternatives. Preliminary review indicates that the Supplemental EIS/EIR may also provide an incomplete picture of impacts associated with the No Project Alternative. In particular, the Supplemental EIS/EIR appears to substantially overstate passenger and cargo handling capacity under the no-build scenario, while understating both for the build scenarios.

Additionally, the No Project Alternative has not represented passenger capacity in a consistent manner. In the original 1997 Notice of Preparation, the No Project Alternative was linked to a range of 68-72 MAP whereas the 2001 and 2003 EIS/EIR documents increased this estimate to 71.2-78.7 MAP. Based on communications provided by LAWA at the Environmental Justice Workshop held in Inglewood, the increase between 1997 and 2001 reflected actual increases in passenger demand during that period. However, there was no equivalent adjustment for the period from 2001-2003, when passenger demand has fallen by almost one-third.

The Supplemental EIS/EIR states that the No Project Alternative is provided as a benchmark for comparison of the four build alternatives. However, use of a higher baseline passenger number minimizes the extent of the difference between existing and future conditions at LAX, which in turn affects comparative impact assessments throughout the EIS/EIR. Use of a *worst-case scenario*, in which the baseline was based on a low estimate of existing passenger demand, would have better served the goals of CEQA and NEPA, and given a more realistic picture of the changes between current and future conditions at LAX. The County believes that LAWA should revisit key impact findings in light of actual 2003 passenger demand, instead of the estimates developed for 2001.

6. Traffic, Noise and Air Quality Impacts have been Shifted Eastward

The revised Master Plan represents a major shift of improvements away from neighboring areas north and south of LAX and toward communities to the east. The unincorporated community of Lennox and the City of Inglewood now appear to bear the

brunt of added traffic, while Manchester will be the primary location for passenger processing. This shift heightens the need for close scrutiny of the proposed mitigation plan and the analysis of Environmental Justice.

7. Major Changes in the Project Call for Preparation of a Subsequent EIS/EIR

CEQA Guidelines require that a Subsequent EIR for a project must be completed if the Lead Agency determines that changes in a project will require major revisions to the previous EIR; a Supplemental EIR may be prepared if the changes in the proposed project are not considered major (§15162(a)). Both Subsequent and Supplemental EIRs are subject to the same notice and public review requirements as the original EIR, but Subsequent EIRs must make available all the information in the environmental evaluation, whereas Supplemental EIRs only need circulate new or revised information.

Preliminary review of the Supplemental EIS/EIR indicates that changes to the proposed project are major. Thus, the project should have been addressed through preparation of a Subsequent EIS/EIR in which the full record of information was consolidated in an effort to facilitate public review.

Public review and lead agency decision-making would also have been better served by providing copies of the comment letters submitted during public review of the original EIS/EIR. Instead, the Supplemental EIS/EIR makes no effort to present or even summarize the earlier comment letters. This approach creates a process that is confusing and cumbersome for reviewing agencies and organizations, and thwarts an opportunity to advance public participation.

8. Growth-Inducing Impacts May Be Significantly Greater than Stated

The Supplemental EIS/EIR bases its analysis of growth inducement on projected cargo and passenger activity. It concludes that by 2015, Alternative D would yield a direct economic output of \$63.7 billion and 350,500 jobs, plus an indirect economic output of \$93.8 billion and 629,000 jobs through a multiplier effect of 1.5. The EIS/EIR assumes that all of the jobs would be within the 5-County SCAG region, 78% of the jobs would be within a 20-mile radius, and 40% within a 10-mile radius of LAX. Finally, it concludes that Alternative D would be similar in terms of job formation to the No Action/No Project Alternative, differing by an increase of about 1%. With respect to collateral development, the EIS/EIR finds Alternative D impacts equivalent to the No Project Alternative for LAX Northside¹, Westchester Southside and Belford, and less than the No Project Alternative for Continental City and Manchester South.

In taking this approach, the document ignores the synergistic effects that would result if LAX Northside is constructed in tandem with the LAX improvements. The increase in cargo will create corresponding increases in off-airport services and place extraordinary pressures on commercial and residential land uses in the immediate neighborhood. The Growth-Inducing Analysis does not appear to address these more localized impacts at all, even though the past history of LAX shows them to be potentially significant.

¹ LAX Northside is approximately 330-acres of land located on the north side of LAX (bisected by Westchester Parkway) and owned by LAWA. Tentative Map #34836, approved for this site during the mid-1980s, would allow development of about 4.5 million square feet of office, hotel, restaurant, retail, research and airport-related land uses.

LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS

**LAX MASTER PLAN DRAFT EIS/EIR
COMMENTS FOR ON-AIRPORT AND OFF-AIRPORT SURFACE TRANSPORTATION
JULY 2003**

The supplement to the Draft EIS/EIR serves to integrate Alternative D into the existing environmental review process for the LAX Master Plan, providing a level of analysis comparable to that which was previously prepared for the other alternatives addressed in the January 2001 Draft EIS/EIR.

Under the new plan, the projected passenger activity in the planning year of 2015 is 78.9 million annual passengers (MAP), which is reduced from the previous alternatives. The 78.9 MAP would be substantially the same as the No Action/No Project alternative and the passenger ground access trips would also be similar to the No Action/No Project alternative.

Alternative D, also known as "The Enhanced Safety and Security Plan," is in response to public comments received during the review period for the Draft EIS/EIR in January 2001. Its lower MAP aims to encourage a long-term regional approach to serving air traffic demand in the Los Angeles basin. The lowered MAP is designed to encourage other airports to accommodate future air travel demand in the region. The report indicates Alternative D would enhance security by limiting access by private vehicles to the main airport infrastructure to reduce the risk to airport users.

Alternative D significantly changes surface transportation access to LAX. Vehicular access is planned on the east and south sides of airport property via La Cienega Boulevard and the I-105 Freeway/Imperial Highway, respectively. Public Works staff conceived and advanced a proposal for new interchange for the I-405 Freeway at Lennox Boulevard and install a cul-de-sac on Lennox Boulevard just east of the freeway. The interchange would provide direct access between the I-405 Freeway and LAX. It would help mitigate the traffic impact at several intersections in the unincorporated Lennox community, reduce the amount of airport-related traffic in the Lennox community, and significantly reduce the travel time for airport-related traffic. Public Works coordinated the proposal with Supervisorial Districts 2 and 4 and presented it to the Lennox Coordinating Council. The Board offices and the Lennox Coordinating Council strongly support the new interchange for the I-405 Freeway at Lennox Boulevard should Alternative D be chosen for LAX.

The following comments are generic and apply to various mitigation measures recommended in the Draft EIS/EIR:

The document indicated mitigation measures may include fair-share contributions to certain projects, such as the Marina Expressway (SR 90) Connector Road to Admiralty Way project. The document should indicate which transportation projects have committed funds programmed and which projects, such as the SR 90 project, have not yet completed the EIR process and have not been funded.

The document should indicate that if a transportation project does not get approved and constructed, mitigation may not be feasible and the LAX Master Plan would have to be approved by overriding considerations.

The document should indicate that the Lincoln Corridor Task Force (LCTF) is studying transportation enhancements and aesthetic improvements along the Lincoln Boulevard corridor from the Santa Monica Freeway to Manchester Boulevard. It should indicate that the LAX project should pay its fair share of traffic mitigation measures recommended by the LCTF in order to mitigate project impacts that are not otherwise able to be mitigated.

A traffic impact analysis was not conducted per the Caltrans Guide for the Preparation for the Traffic Impact Studies. The Guide indicates that a traffic impact study should be performed when a project adds one or more vehicle trips during the peak hour for a freeway segment that is operating at level of service (LOS) E or F.

The following comments pertain to specific information pertaining to traffic and transportation in the Draft EIS/EIR:

Executive Summary

4-282 At the intersection of Lincoln Boulevard/Washington Boulevard, improvements for 2015 indicates mitigation is performed in 2008. The County's Marina Expressway (SR 90) Connector Road to Admiralty Way project is targeted for completion in 2011, pending approval by all jurisdictions and funds (\$15 million) are in place. A footnote should be placed by this and all other transportation projects specified as mitigation not approved and funded.

4-288 The document states "Y Lennox Boulevard will terminate east of I-405 at Redfern Avenue, resulting in the elimination of access to Lennox Boulevard from La Cienega Boulevard." It should state that pedestrian access between Lennox Boulevard and La Cienega Boulevard will be maintained and sufficient right of way will be made available for community needs in the vicinity.

4-290 The document indicates signal synchronization (ATSAC, ATCS, or equivalent) for segments of La Cienega Boulevard in the County's jurisdiction is recommended as

a mitigation. Since the County does not participate in the City of Los Angeles=ATSAC program, the possible traffic signal synchronization improvements should be to integrate the intersections into the County Traffic Control System (TCS) as part of the Traffic Management Center (TMC).

- 4-293 We agree with the statement "Along the northbound side of I-405 near Lennox Boulevard, elevated roadways would extend from the I-405 interchange to Lennox Boulevard. These roadways would run adjacent to two local schools and along residences. Sound walls would need to be placed along these stretches of the roadway to reduce the amount of noise impact to the schools and residences."

Technical Report S-2a: On-Airport Surface Transportation

- 11 The capacity for main access roads (Century Boulevard and Sepulveda Boulevard) assumed in the study of 1,500 to 1,700 vehicles per hour per lane (vphpl) appears to be high. HCM 2000 (page 10-10) suggests around 1,140 for these types of roadways which are classified as Class I Urban Streets. For transitions from main access roads to curb approaches, a capacity of approximately 850 vphpl is suggested in HCM 2000. The capacities for other road types appear to be on the high side as well. Justifications for these capacity assumptions should be provided or reduced to a more realistic capacities suggested in HCM 2000.

Technical Report 2b: Off-Airport Surface Transportation

- 4 Figure S1 shows the study area and key study locations. Figure S4 shows increase in traffic due to the airport expansion project along Lincoln Boulevard and La Cienega Boulevard, north of the I-405. Also, traffic in the Lincoln Boulevard corridor uses Admiralty Way as an alternate to Lincoln Boulevard. Approximately 35 to 40 percent of traffic on Admiralty Way is bypass traffic, some of which is from Lincoln Boulevard. Therefore, the traffic analysis should include all the intersections along Admiralty Way and the Washington Boulevard/Via Marina intersection. In addition, the following intersections in the unincorporated Baldwin Hills area should be analyzed:

- ☐ La Cienega Boulevard at Stocker Street
- ☐ La Cienega Boulevard at Slauson Avenue ramps
- ☐ Stocker Street at La Brea Avenue
- ☐ Slauson Avenue at La Brea Avenue

- 30 Figure S3, Differences in LAX Passenger Trips B 2015 PM Peak Hour B Alternative D B Adjusted Environmental Baseline, shows decrease in traffic along Pershing Drive with the project. This does not make sense since employee parking structure for 12,400 stalls is proposed east of Pershing Drive north of Imperial Hwy. There should be an increase in airport traffic due to the proposed parking structure.

- 35 Additional Fly-Away sites are proposed and assumed in the traffic impact analysis. Specific locations should be identified and some level of commitment must be made to ensure these additional sites will be implemented. It should also state that a separate environmental impact analysis will be conducted for any additional sites.
- 36 Sufficient capacity should be provided for the intersection of the ITC and GTC connector road and the new access road proposed with the Lennox Boulevard/I-405 interchange. Free right-turn lanes should be provided to ensure sufficient turning movement capacity. The level of service should be conducted to ensure that adequate capacity exists.
- 47 Project fair share estimates for the impacted Congestion Management Program (CMP) routes and intersections are based on the growth between 1996 (Environmental Baseline) and 2015. This seems inconsistent with the impact analysis since the project impact was evaluated based on comparing to the 2015 Adjusted Environmental Baseline.
- 62 The haul and detour routes for any airport construction near the unincorporated areas should also be submitted to the County of Los Angeles Department of Public Works for review.

JHC:cn
T-4/LAXDIRESDOC

SCHEDULED PUBLIC HEARINGS

Date	Location
Monday, August 11, 2003 5:00 PM - 9:00 PM	Radisson Plaza Hotel 3515 Wilshire Blvd., Los Angeles
Tuesday, August 12, 2003 5:00 PM - 9:00 PM	Ontario Airport Marriott 2200 E. Holt Blvd., Ontario
Wednesday, August 13, 2003 5:00 PM - 9:00 PM	Luminarias Restaurant 3500 Ramona Blvd., Monterey Park
Thursday, August 14, 2003 5:00 PM - 9:00 PM	Peck Park 560 N. Western Avenue, San Pedro
Monday, August 18, 2003 5:00 PM - 9:00 PM	Hollywood Park Pavilion 3883 West Century Blvd., Inglewood
Tuesday, August 19, 2003 6:00 PM - 10:00 PM	Airtel Plaza Hotel 7277 Valjean Avenue, Van Nuys
Wednesday, August 20, 2003 5:00 PM - 9:00 PM	Joslyn Community Center 1601 Valley Drive, Manhattan Beach
Thursday, August 21, 2003 5:00 PM - 9:00 PM	Palmdale Regional Airport 41000 20th Street East, Palmdale
Saturday, August 23, 2003 9:00 AM - 1:00 PM	Furama Hotel 8601 Lincoln Blvd., Los Angeles